

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action No. 3:21-cv-259
(DCG-JES-JVB)
(consolidated cases)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE TO COMPEL
REOPENED LEGISLATIVE DEPOSITION TESTIMONY OF REPRESENTATIVES
HUNTER AND MURR**

The United States of America respectfully requests an extension of time for parties to file a motion to compel legislative deposition testimony of Representatives Todd Hunter and Andrew Murr until seven business days after receipt of the later of the two transcripts. These reopened depositions were conducted on October 11 and 12, and the deposition transcripts have not yet been received. Pursuant to the Court's July 28, 2022 Order, any motions to unseal materials over which deponents have asserted legislative privilege are due on October 18 and 19 respectively. Order, ECF No. 490. However, the parties have worked "in good faith to agree to an appropriate filing date on a case-by-case basis." *Id.* The parties have conferred, and counsel for Representatives Hunter and Murr do not oppose the relief sought. The United States respectfully requests that the Court grant an extension for a motion to compel related to these depositions until seven business days after receipt of the later of the two transcripts. A proposed order is attached hereto.

DATED: October 18, 2022

Respectfully submitted,

ELISE C. BODDIE
Principal Deputy Assistant Attorney General
Civil Rights Division

/s/ Holly F.B. Berlin
T. CHRISTIAN HERREN, JR.
TIMOTHY F. MELLETT
DANIEL J. FREEMAN
JANIE ALLISON (JAYE) SITTON
MICHELLE RUPP
JACKI L. ANDERSON
JASMIN LOTT
HOLLY F.B. BERLIN
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20530

CERTIFICATE OF CONFERRAL

I hereby certify that on October 13, 2022, counsel for the United States met and conferred with counsel for Representatives Hunter and Murr concerning the subject of this motion. Counsel indicated no opposition to the relief sought.

/s/ Holly F.B. Berlin

Holly F.B. Berlin

Voting Section

Civil Rights Division

U.S. Department of Justice

holly.berlin@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2022, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Holly F.B. Berlin

Holly F.B. Berlin

Voting Section

Civil Rights Division

U.S. Department of Justice

holly.berlin@usdoj.gov